

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	<b>§</b>	
<b>BRAZOS LICENSING AND</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-00984-ADA</b>
<b>DEVELOPMENT,</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-00985-ADA</b>
<i>Plaintiff,</i>	<b>§</b>	
	<b>§</b>	
<b>v.</b>	<b>§</b>	
	<b>§</b>	
<b>CANON, INC.,</b>	<b>§</b>	
<i>Defendant.</i>	<b>§</b>	
	<b>§</b>	

**PLAINTIFF WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND  
DEVELOPMENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSES TO DEFENDANT CANON, INC.'S MOTIONS TO DISMISS AND  
TO FILE AN AMENDED PLEADING**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) files this Unopposed Motion for Extension of Time to File Responses to Defendant Canon, Inc.’s (“Canon”) Motions to Dismiss and to File an Amended Pleading and shows:

On October 19, 2021, WSOU filed Complaints for Patent Infringement against Canon.

*See* Dkt. 1.<sup>1</sup>

On March 15, 2021, Canon filed Motions to Dismiss under Federal Rule of Civil Procedure 12(b)(6) (“Motions to Dismiss”). *See* Dkt. 13. On March 18, 2021, WSOU filed an Unopposed Motion for Extension of Time to File Responses to Canon’s Motions to Dismiss (“Unopposed Motion”). *See* Dkt. 18. On March 22, 2021, the Court granted WSOU’s

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<sup>1</sup> “Dkt. \_\_\_\_” refers to both Case No. 6:20-cv-00984 and 6:20-cv-00985.

Unopposed Motion and extended WSOU's deadline to file responses to Canon's Motions to Dismiss through and including April 12, 2021. *See* Text Orders dated March 22, 2021.

On March 26, 2021, the parties filed a Joint Motion for Extension of Upcoming Deadlines ("Joint Motion"). *See* Dkt. 20. On March 29, 2021, the Court granted the Joint Motion extending WSOU's deadline to file an amended pleading through and including April 12, 2021. *See* Dkt. 21.

WSOU requests an additional 14-day extension of its current April 12, 2021 deadline, up to and including April 26, 2021, for filing responses to Canon's Motions to Dismiss and an amended pleading so that the Parties can discuss stipulations of dismissal to narrow the cases and resolve Canon's pending Motions to Dismiss. Canon does not oppose this extension.

Based on the foregoing, WSOU respectfully requests the Court extend the deadline for filing responses to Canon's Motions to Dismiss and filing an amended pleading by an additional 14 days, up to and including April 26, 2021.

Dated: April 12, 2021

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop  
Jonathan K. Waldrop (CA Bar No. 297903)  
(Admitted in this District)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Admitted in this District)  
djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Admitted in this District)  
mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Admitted in this District)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Admitted in this District)  
hkim@kasowitz.com  
Jack Shaw (CA Bar No. 309382)  
(Admitted in this District)  
jshaw@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065  
Telephone: (650) 453-5170  
Facsimile: (650) 453-5096

Mark D. Siegmund (TX Bar No. 24117055)  
mark@waltfairpllc.com  
**LAW FIRM OF WALT FAIR, PLLC**  
1508 N. Valley Mills Drive  
Waco, TX 76710  
Telephone: (254) 772-6400  
Facsimile: (254) 772-6432

**Attorneys for Plaintiff**  
**WSOU INVESTMENTS, LLC d/b/a**  
**BRAZOS LICENSING AND**  
**DEVELOPMENT**

**CERTIFICATE OF CONFERENCE**

On April 12, 2021, counsel for WSOU communicated with Richard F. Martinelli, counsel for Canon, concerning the foregoing motion and Mr. Martinelli advised that Canon was not opposed to the grant of a 14-day extension of time for WSOU to file responses to Canon's Motions to Dismiss and file an amended pleading.

*/s/ Jonathan K. Waldrop*  
Jonathan K. Waldrop

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of April, 2021, the foregoing document was filed electronically with the Clerk of the Court via the Court's CM/ECF system which will send notification of such filing and constitute service upon all counsel of record who have registered as Filing Users. Any other known counsel of record will be served with a copy of the foregoing document via email.

*/s/ Jonathan K. Waldrop*  
Jonathan K. Waldrop